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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

TIFFENY NANCE, on behalf of herself
and the Class Members,

Plaintiff,

vs.

RYDER INTEGRATED LOGISTICS,
INC., a Delaware Corporation; and RYDER
SYSTEM, INC., a Florida Corporation,

Defendants.

Case No. 2:23-cv-00477-TLN-JDP

[Assigned to the Honorable Troy L.
Nunley]

**STIPULATION AND ORDER TO
STAY DISCOVERY FOR THIRTY
DAYS**

Complaint Filed: March 13, 2023
Trial Date: None

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RYDER INTEGRATED LOGISTICS, INC.
8 and RYDER SYSTEM, INC.

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1 Plaintiff Tiffeny Nance (“Plaintiff”) and Defendants Ryder Integrated Logistics, Inc.
2 and Ryder System, Inc. (collectively, “Ryder”) (together the “Parties”), by and through their
3 undersigned counsel, hereby enter into the below stipulation with reference to the following
4 facts:

5 WHEREAS, on March 13, 2023, Plaintiff filed her class-action complaint for
6 damages against Ryder in the United States District Court for the Eastern District of
7 California, captioned *Tiffeny Nance v. Ryder Integrated Logistics, Inc. et al.*, Case No.
8 2:23-cv-00477 (Plaintiff’s “Class Action”);

9 WHEREAS, as relevant here, there are currently two related cases pending
10 against Ryder in the United States District Court for the Northern District of California:
11 *Perkins v. Hadco Santa Fe Springs CA dba Ryder Integrated Logistics, Inc.*, Case No.
12 3:23-cv-00502-WHO & 3:23-cv-01694-WHO (“*Perkins*”) and *Jose Johnson, et al. v.*
13 *Ryder Transp. Solutions, LLC*, Case No. 4:22-cv- 07456-JST (“*Johnson*”);

14 WHEREAS, on October 24, 2023, Ryder and the parties in the *Perkins* and
15 *Johnson* actions participated in a successful mediation and agreed to a settlement in
16 principle that, by definition, Ryder states encompasses the putative class and claims
17 alleged in Plaintiff’s Class Action;

18 WHEREAS, the Parties previously stipulated to extend the Phase I Discovery
19 Cutoff deadline by sixty days to March 12, 2024; and

20 WHEREAS, on January 3, 2024, the Parties stipulated to stay discovery in this
21 case by thirty days in exchange for Ryder providing the executed Settlement
22 Agreement to counsel in this case when it is fully executed, to give the Parties time to
23 meet and confer regarding the impact of the *Perkins/Johnson* settlement on this case.

24 WHEREAS, in response to the Parties’ stipulation, on January 3, 2024, the Court
25 signed an order staying discovery for thirty days;

26 WHEREAS, the *Perkins/Johnson* settlement is still undergoing revision but is
27 near completion;

28

1 WHEREAS, the Parties seek to stay discovery for another thirty days so that
2 Ryder can provide a copy of the executed Settlement Agreement to counsel when
3 finalized, and so that the Parties can accomplish their original objective of conferring
4 regarding the impact of that settlement on this case;

5 WHEREAS, Plaintiff seeks a commensurate sixty day extension of her deadline
6 to file a motion for class certification, and the Parties have agreed to this.

7 IT IS HEREBY JOINTLY STIPULATED AND AGREED, by and between the
8 Parties through their respective counsel of record that:

9 1. The Parties agree that this Court enter an Order to stay all current and
10 pending discovery in this case for thirty days.

11 2. The Parties agree that this Court enter an Order extending Plaintiff's
12 deadline to file a motion for class certification by sixty days.

13 **IT IS SO STIPULATED.**

14 Dated: January 31, 2024

SCHNEIDER WALLACE
COTTRELL KONECKY LLP

16 By: /s/ Eugene Zinovyev

17 Carolyn H. Cottrell
18 Ori Edelstein
19 Eugene Zinovyev
20 *Attorneys for Plaintiff*
TIFFENY NANCE

21 Dated: January 31, 2024

REED SMITH LLP

23 By: /s/ Rafael N. Tumanyan

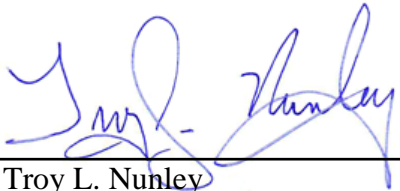
24 Mara D. Curtis
25 Rafael N. Tumanyan
26 Tanner J. Hendershot
27 *Attorneys for Defendants*
28 RYDER INTEGRATED LOGISTICS, INC.
and RYDER SYSTEM, INC.

ORDER

Pursuant to the above Stipulation, and good cause appearing, **IT IS SO ORDERED** as follows:

1. All current and pending discovery in this case is stayed for thirty days.
2. Plaintiff's deadline to file a motion for class certification is extended by sixty days.

Dated: January 31, 2024


Troy L. Nunley
United States District Judge